

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 TAYLOR THOMSON,

12 Plaintiff,

13 v.

15 PERSISTENCE TECHNOLOGIES BVI
16 PTE LTD., TUSHAR AGGARWAL,
17 AND ASHLEY RICHARDSON,

18 Defendants.

Case No.: 2:23-cv-04669-MEMF-MAR

**[PROPOSED] ORDER GRANTING
PLAINTIFF TAYLOR THOMSON'S
APPLICATION FOR LEAVE TO
FILE DOCUMENT UNDER SEAL**

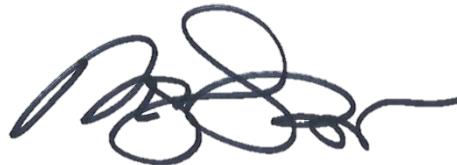
20 On August 23, 2025, Plaintiff Taylor Thomson filed an Application for Leave to
21 File Document Under Seal. The Court will seal documents related to a non-dispositive
22 motion when the requesting party has demonstrated "good cause" why the documents
23 at issue should be sealed. C.D. L.R. 79-5.2.2(a)(i); *Ctr. for Auto Safety v. Chrysler Grp.,*
24 LLC, 809 F.3d 1092, 1097 (9th Cir. 2016). The request for leave must be "narrowly
25 tailored" to seal only the sealable material. C.D. Cal. L.R. 79-5.2.2(a)(ii).

26 Having considered Plaintiff's Application, the Court finds that there is good
27 cause in this instance to seal the requested portion of Exhibit B to the Declaration of
28 Todd Harrison in Support of Plaintiff's Sur-reply in Opposition to Defendant's Motion

1 to Compel and Request for Sanctions. C.D. L.R. 79-5.2.2(a)(i); *Ctr. for Auto Safety v.*
2 *Chrysler Grp., LLC*, 809 F.3d 1092, 1097 (9th Cir. 2016). The Court also finds the
3 request is narrowly tailored. The reasons to seal Exhibit B outweigh the common law
4 right of access.

5 The Court therefore GRANTS Plaintiff's Application and ORDERS sealed
6 Exhibit B to the Declaration of Todd Harrison in Support of Plaintiff's Sur-reply in
7 Opposition to Defendant's Motion to Compel and Request for Sanctions. The Court
8 further ORDERS that Plaintiff's proposed redacted Exhibit B shall be deemed filed.

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10 IT IS SO ORDERED.



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12 Dated: 9/2/2025

13 HON. MARGO A. ROCCONI
14 United States Magistrate Judge

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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in Los Angeles, California. My business address is McDermott Will & Schulte, LLP, 2049 Century Park East, Suite 3200, Los Angeles, CA 90067. I am over the age of eighteen years and not a party to this action.

On August 23, 2025, I served unredacted copies of the following document:

**[PROPOSED] ORDER GRANTING PLAINTIFF TAYLOR THOMSON'S
APPLICATION FOR LEAVE TO FILE DOCUMENT UNDER SEAL**

ON THE FOLLOWING PARTY VIA EMAIL AND U.S. MAIL:

Ashley Richardson
25399 Markham Lane
Salinas, CA 93908
ashrichardson@mac.com

Defendant in Pro Per

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on August 23, 2025 in Los Angeles, California.

/s/ Diksha Vadan

Diksha Vadan